

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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April 13, 2021

BY ECF

The Honorable Judge Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**RE: United States v. Shakeil Chandler
19 Cr. 867 (PAC)**

Honorable Judge Crotty:

I write to request that the Court modify Shakeil Chandler's bail conditions in the above-captioned case to allow his mother, Sandra Chandler, to be reinstated as his third party custodian. Pretrial services consents to this request. The Government does not object to this request.

On March 31, 2020, the Court issued an Order granting Mr. Chandler's motion for temporary pretrial release from the Metropolitan Correctional Center. The following conditions, in relevant part, were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; 24-hour home incarceration to be enforced by location monitoring technology to be determined by Pretrial Services with permission to leave the residence exclusively for necessary medical services; report and disclose to Pretrial Services when any cohabitant the residence, including himself, may be symptomatic of any illness.

Doc. No. 19.

On April 3, 2020, the Court modified the Order to designate Sandra Chandler, Mr. Chandler's mother, as the third party custodian. Doc. No. 24. The Order was originally set to expire on May 30, 2020, 60 days after its entry. Doc. No. 19. On June 2, 2020, Your Honor extended the Order to August 31, 2020. Doc. No. 32.

On July 7, 2020, the Government disclosed exculpatory evidence that effectively excludes Mr. Chandler as a contributor to the DNA found on the weapon he is alleged to have possessed. On July 10, 2020 the Court granted defense counsel's request for a bail modification,

removing the condition of home incarceration and imposing a curfew to be enforced by location monitoring. On July 29, 2020 the Court denied the defense's application to modify Mr. Chandler's curfew hours to enable him to work an overnight job.

The conditions of Mr. Chandler's release require him to have a third party custodian. On March 8, 2021, the Court granted Mr. Chandler's request to modify his bail conditions to allow his cousin, Christopher Chandler, to become his third party custodian, which would enable Shakeil Chandler to move in with his cousin. Since then, Mr. Chandler decided to remain at his mother's home, where he has been living since his release. Accordingly, Mr. Chandler respectfully requests that the Court reinstate Mr. Chandler's mother, Sandra Chandler, as his third party custodian. Pretrial Services consents to this request; the Government does not object.


Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:



4/14/2021

HONORABLE PAUL A. CROTTY
United States District Judge

cc: Jun Xiang, Assistant U.S. Attorney
Jonathan Lettieri, Pre-Trial Services Officer